

August 15, 2019

Regional Freedom of Information Officer U.S. EPA, Region 1 (OARM01-6) 5 Post Office Square, Suite 100 Boston, MA 02109-3912 (617) 918-1102

Re: Freedom of Information Act Request

Dear Sir or Madam:

Pursuant to the Freedom of Information Act (FOIA), 5 U.S.C. 552, I am requesting copies and/or access to records held at EPA's Region 1 office.

Records of interest include documents created, compiled, and submitted to the EPA under regulatory programs such as the Resource Conservation and Recovery Act (RCRA), the Toxic Substances Control Act (TSCA), Clean Air Act (CAA), the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), and the Emergency Planning and Community Right-to-Know Act (EPCRA).

Specifically, I am requesting release of a number of specific documents and types of documents held at Region 1 concerning the operations of Original Bradford Soap Works in West Warwick, Rhode Island. Below, I have included information on the site occupant's name, address(es), any available facility ID numbers, and the types of documents requested. The following sections are arranged according to specific EPA regulatory programs.

## AIR Requested Documents

We understand that Original Bradford Soap Works at 200 Providence Street, West Warwick, RI operated under the regulation of the Clean Air Act with the following facility ID: RI0000004400700094.

We therefore request the following documents related to this facility:

- Air permit registration and application documents
- Inspection files
- Correspondence for 1998 and earlier

## RCRA Requested Documents

We understand that hazardous waste generated by Original Bradford Soap Works at 200 Providence Street, West Warwick, RI was regulated under the Resource Conservation and Recovery Act (RCRA) and was assigned the following RCRA facility ID: RID982715559.

We request the following materials relating to this facility produced by the company as required by RCRA:

- RCRA Notification
- Part A application (Form 8700-12)
- Related inspections and correspondence for the period 1989 and earlier
- Work plans and closure documentation related to contamination processes and chemical releases
- RCRA Part B Application and related correspondence to and from EPA.

# **SSTS Requested Documents**

As required under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) Section 7, information on pesticide establishments is tracked through the Section Seven Tracking System (SSTS). We understand that Original Bradford Soap Works at 200 Providence Street, West Warwick, RI registered with the company number 34310-RI-1. We therefore request submittal documentation provided by this company.

We also understand that in 2014 Original Bradford Soap Works failed to file the above FIFRA documents and the case was referred to Docket 01-2014-4506. We request documentation related to this docket file.

#### TSCA Inventory Requested Documents and PCB Regulations

We understand that, under the chemical inventory provisions of the Toxic Substances Control Act (TSCA), Original Bradford Soap Works at 200 Providence Street, West Warwick, RI identified certain chemicals used at this site and was assigned the following ID number: 200003397.

We also understand that, under the PCB regulations adopted pursuant to section 6 of the Toxic Substances Control Act, that PCB waste materials may have been used or remediated at this site. We therefore request the following documents related to this facility produced as required by TSCA:

- Documentation of any PCB related notifications, inspections, and enforcement actions involving these locations or parties including documentation regarding the following PCB activity at 200 Providence Street:
  - o 2011 waste manifest for 100 kgs of solid PCBs
  - o 2005 waste manifest for 389 kgs of transformer oil
  - o 2005 waste manifest for 136 kgs of transformer oil

• Documentation of any other non-PCB related notifications, inspections, and enforcement actions involving these locations or parties.

# TRI Requested Documents

We understand that Original Bradford Soap Works at 200 Providence Street, West Warwick, RI was required to file an annual report with the EPA's Toxics Release Inventory (TRI) Program to document the release of certain chemicals. The company was assigned the following TRI facility ID: 02893RGNLB200PR.

We therefore request the annual report / submittal (also known as "Form R") filed by company for the 1987 reporting year.

# Request Information

History Associates requests the release of the above materials. If this is not possible, we request information as to why, as we understand that these collections are publically accessible under statutory regulations.

History Associates agrees to pay all reasonable and standard processing fees authorized by 5 U.S.C. 552(a)(4)(A) and the applicable regulations up to \$250. Should the fees exceed this amount, please call me with an estimate of the total costs in order that specific expenditures beyond \$250 can be authorized.

Should you have any questions or concerns regarding this request, please contact me at (301) 279-9697 or via email at HBergen@historyassociates.com.

Sincerely,

Hilary Bergen